

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XiaoQian Zhao,)	
)	
Plaintiff,)	
)	Case No.: 1:23-cv-04507
)	
v.)	Dist. Judge Matthew F. Kennelly
)	
The Partnerships and Unincorporated)	
Associations Identified on Schedule A,)	
)	
Defendants.)	

**MOTION TO VACATE DEFAULT JUDGMENT
AND TO DISMISS WITH PREJUDICE**

Pursuant to Rules 41, 55, and 60 of the Federal Rules of Civil Procedure, Defendant episolutions hereby moves this Court to vacate the default order entered in this case on September 25, 2023 against episolutions (No. 26) (“Defendant”).

IT IS HEREBY REQUESTED that the order of default entered in the above captioned action be vacated against Defendant episolutions (No. 26) pursuant to Fed. R. Civ. P. 60.

IT IS FURTHER REQUESTED that the above captioned action be dismissed, with prejudice, pursuant to Fed. R. Civ. P. 41 as against episolutions.

In the interim, this Defendant (No. 26) has filed its answer and affirmative defenses.

Dated: September 28, 2023

Respectfully submitted,

/s/ Robert D. Kreisman

Robert D. Kreisman

(Bar No. 1529269)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was electronically filed on September 28, 2023 with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all registered attorneys of record.

/s/ Robert D. Kreisman